

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Dewald Manufacturing
1217 7th Street
Mishawaka, Indiana 46544**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages. This permit and the conditions listed herein replace and supercede Registered Construction and Operation Status CP 141-10007-00184, issued pursuant to Sections 1 and 2 of 326 IAC 2-1 on December 7, 1998.

Operation Permit No.: MSOP 141-10870-00184	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary industrial recreational vehicle (RV) slide out unit manufacturing source and coating source.

Authorized Individual:	Frank Zappia
Source Address:	1217 7 th Street, Mishawaka, Indiana 46544
Mailing Address:	1217 7 th Street, Mishawaka, Indiana 46544
Phone Number:	(219) 256-0782
SIC Code:	3792
County Location:	St. Joseph
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) spray booth identified as E01, coating a maximum of ten (10) industrial recreational vehicle (RV) metal slide out units per hour, utilizing an electrostatic air spraying application system and dry filters for particulate matter overspray control, exhausting to one (1) stack identified as S01.
- (b) One (1) natural gas fired space heater with a maximum heat input capacity of 160,000 British thermal units (Btu) per hour, exhausting to a stack not identified.
- (c) Miscellaneous metal working operations including eight (8) metal inert gas (MIG) welding stations using a maximum of 0.35 pound of copper wire per station; one (1) oxyacetylene cutting operation cutting 65 inches of metal per hour; and one (1) totally enclosed metal deburring operation.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Minor Source Status [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7]

- (a) The total source potential to emit of volatile organic compounds (VOC) and particulate matter (PM) is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;

- (3) The Compliance Monitoring Requirements in Section D of this permit;
- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray booth identified as E01, coating a maximum of ten (10) industrial recreational vehicle (RV) metal slide out units per hour, utilizing an electrostatic air spraying application system and dry filters for particulate matter overspray control, exhausting to one (1) stack identified as S01.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at spray booth E01 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (c), the PM from paint booth E01 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and control device.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when paint booth E01 is in operation.

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (S01) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.1.1.
 - (1) The amount and VOC content (including pounds of VOC per gallon of coating, less water) of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

There are no reporting requirements specific to this facility.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) Miscellaneous metal working operations including eight (8) metal inert gas (MIG) welding stations using a maximum of 0.35 pound of copper wire per station; one (1) oxyacetylene cutting operation cutting 65 inches of metal per hour; and one (1) totally enclosed metal deburring operation.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Process Weight Activities

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2(c), the particulate matter emission rate from the metal welding/cutting operation shall not exceed 0.55 pounds per hour when operating at a process weight rate of 0.05 tons of metal per hour, as established by E in the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no applicable compliance monitoring conditions for the facilities.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no record keeping or reporting requirements specific to the facilities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Dewald Manufacturing
Address:	1217 7th Street
City:	Mishawaka, Indiana 46544
Phone #:	(219) 256-0782
MSOP #:	141-10870-00184

I hereby certify that Dewald Manufacturing is: ☒ still in operation.
 ☐ no longer in operation.

I hereby certify that Dewald Manufacturing is: ☒ in compliance with the requirements of MSOP 141-10870-00184.
 ☐ not in compliance with the requirements of MSOP 141-10870-00184.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y _____ N _____

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y _____ N _____

COMPANY: Dewald Manufacturing PHONE NO. (219) 256 - 0782
LOCATION: (CITY AND COUNTY) Mishawaka, St. Joseph County
PERMIT NO. MSOP 141-10870-00184 AFS PLANT ID: 00184 AFS POINT ID: 01 INSP: Rick Reynolds
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Dewald Manufacturing
Source Location: 1023 West 7th Street, Mishawaka, Indiana 46544
County: St. Joseph
SIC Code: 3792
Operation Permit No.: MSOP141-10870-00184
Permit Reviewer: Michael Hirtler / EVP

The Office of Air Management (OAM) has reviewed a source modification application from Dewald Manufacturing relating to an increase in the number of metal units coated at the existing spray booth at this industrial recreational vehicle (RV) slide out unit manufacturing plant.

History

On December 7, 1998, OAM issued Dewald Manufacturing Registered Construction and Operation Status CP141-10007-00184 as the first-time approval for the source. On April 16, 1999, the source submitted an application to the OAM requesting an increase in production at the source's coating facility, spray booth E01. Based on this and additional information submitted to OAM on May 8, 2000, the requested modification is subject to 326 IAC 2-6.1. The source will be issued a first-time Minor Source Operating Permit (MSOP) that will supercede existing Registration CP141-10007-00184 upon its approval.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) spray booth identified as E01, coating a maximum of ten (10) industrial recreational vehicle (RV) metal slide out units per hour, utilizing an electrostatic air spraying application system and dry filters for particulate matter overspray control, exhausting to one (1) stack identified as S01.
- (b) One (1) natural gas fired space heater with a maximum heat input capacity of 160,000 British thermal units (Btu) per hour, exhausting to a stack not identified.
- (c) Miscellaneous metal working operations including eight (8) metal inert gas (MIG) welding stations using a maximum of 0.35 pound of copper wire per station; one (1) oxyacetylene cutting operation cutting 65 inches of metal per hour; and one (1) totally enclosed metal deburring operation.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Registered Construction and Operation Status, CP141-10007-00184, issued on December 7, 1998.

Upon its approval MSOP 141-10870-00184 will supercede and replace Registered Construction and Operation Status CP141-10007-00184, issued on December 7, 1998, and all conditions contained therein.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 16, 1999, with additional information received on May 8, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (three (3) pages).

Potential To Emit Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

This table reflects the PTE for the source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	22.1
PM-10	22.1
SO ₂	0.0
VOC	26.3
CO	0.1
NO _x	0.1
HAP's	Potential To Emit (tons/year)
styrene monomer	0.8
cobalt compound	0.8
naphthalene	4.0
TOTAL	5.6

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of volatile organic compounds (VOC) is equal to or greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-6.1, and as an existing source, a minor source operating permit is required for operation of this source modification.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-10	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	maintenance
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as a maintenance area for ozone since November 19994. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) St. Joseph County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	10.2
PM10	10.2
SO ₂	0.0
VOC	19.6
CO	0.0
NO _x	0.1

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Document for Registered Construction and Operation Status, CP141-10007-00184, issued on December 7, 1998.

Potential to Emit After Controls

The table below summarizes the total potential to emit, reflecting all limits, of the modification (based on 8,760 hours of operation per year at rated capacity including enforceable emissions control and/or production limits, where applicable):

	Limited Potential to Emit * (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Spray Booth E01	1.1	1.1	0.0	26.3	0.0	0.0	4.0	5.6
Other Existing Source ** Emissions	1.1	1.1	0.0	0.0	0.1	0.1	0.0	0.0
Total Emissions	2.1	2.1	0.0	26.3	0.1	0.1	4.0	5.6
PSD Threshold Level	250	250	250	250	250	250	N/A	N/A

* Upon approval, this proposed modification and MSOP will supercede existing Registered Construction and Operation Status CP 141-10007-00184, issued on December 7, 1998. The emissions presented in this table are for the entire source as well as the modification. For future permitting purposes, the "Total Emissions" row will replace the "Existing Source PSD Definition" emissions of the previous section.

** Taken from the Technical Support Document to Registered Construction and Operation Status CP 141-10007-00184, issued on December 7, 1998, for miscellaneous welding/cutting/combustion equipment.

This existing minor PSD source is not a major stationary source after the modification because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply to the source.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit MSOP141-10007-00184, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAM inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61) applicable to this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source shall prepare and maintain a Preventive Maintenance Plan (PMP) for the surface coating facilities and their control devices within ninety (90) days after issuance of this approval. Current OAM policy requires that a PMP be prepared pursuant to the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan) for surface coating facilities and related control devices.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

Spray paint booth E01 is an existing permitted facility constructed after the July 27, 1997 rule applicability date. The current review does not involve any new construction or reconstruction of the coating facility, nor does the facility have a PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs. Therefore, the requirements of this rule do not apply to spray paint booth E01.

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD), this proposed modification is not considered a major modification because the source is an existing PSD minor stationary source and the proposed modification has the potential to emit less than applicable PSD threshold emission levels for any regulated pollutant. Therefore, the PSD rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply to the modification.

This existing minor PSD source is not a major stationary source after the modification because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply to the source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in St. Joseph County and the potential to emit volatile organic compounds is greater than ten (10) tons per year. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

State Rule Applicability - Individual Facilities

326 IAC 6-1 (Particulate Rules - Nonattainment Area Limitations)

Pursuant to 326 IAC 6-1-1 (Applicability), specifically listed sources, or sources not specifically listed but located in a listed county and having either a potential to emit (PTE) one hundred (100) tons per year (tpy) or more or actual emissions of ten (10) tpy or more of particulate matter (PM), are subject to the applicable limitation(s). The source is located in St. Joseph County which is a specifically listed county; however, the source does not have a PTE 100 tpy nor does it have actual emissions of 10 tpy. Therefore, the requirements of 326 IAC 6-1 do not apply to the source.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (c), the particulate matter (PM) overspray from surface coating facility E01 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The particulate matter emissions from facility E01 shall comply with 326 IAC 6-3-2 by using dry filters for overspray control at all times when the coating station is in operation.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2(c), the particulate matter emission rate from the metal welding/cutting operation shall not exceed 0.55 pounds per hour when operating at a process weight rate of 0.05 tons of metal per hour, as established by E in the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The 0.55 pounds per hour limit is equivalent to 2.41 tons of PM emitted per year. Based on the Technical Support Document to CP 141-100007-00184, which was issued on December 7, 1998 and will be superceded by this permit upon its approval, and calculations made therein, the metal welding/cutting operations have an uncontrolled potential to emit PM of 1.05 tons per year. The facility is in compliance with the PM emission limit requirement of 326 IAC 6-3-2.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at spray booth E01 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

Conclusion

The operation of this industrial recreational vehicle (RV) slide out unit manufacturing source, including increased coating usage at the existing spray paint booth, shall be subject to the conditions of the attached proposed Minor Source Operating Permit MSOP141-10870-00184.

Appendix A: Emissions Summary (Page 1 of 3)

Company Name: Dewald Manufacturing
Address City IN Zip: 1217 7th Street, Mishawaka, IN 46544
MSOP No.: 141-10870-00184
Reviewer: Michael Hirtler / EVP
Date: March 14, 2000

Uncontrolled Potential to Emit (tons/year)**Emissions Generating Activity**

Pollutant	Combustion *	Welding/metal cutting*	Surface Coating	Total
PM	0.01	1.05	21.03	22.09
PM-10	0.01	1.05	21.03	22.09
SO2	0.00	0.00	0.00	0.00
NOx	0.09	0.00	0.00	0.09
VOC	0.00	0.00	26.25	26.25
CO	0.07	0.00	0.00	0.07
Single HAP	0.00	0.01	3.98	3.99
Total HAPs	0.00	0.01	5.55	5.56

* Taken from Technical Support Document to Registered Construction and Operation Status CP 141-10007-00184, issued December 7, 1998, which has been superceded by this MSOP 141-10870-00184.

^ Total Uncontrolled Potential to Emit based on rated capacity assuming operations at 8,760 hours per year.

Controlled/Limited Potential to Emit (tons/year)**Emissions Generating Activity**

Pollutant	Combustion	Welding/metal cutting *	Surface Coating	Total
PM	0.01	1.05	1.05	2.11
PM-10	0.01	1.05	1.05	2.11
SO2	0.00	0.00	0.00	0.00
NOx	0.09	0.00	0.00	0.09
VOC	0.00	0.00	26.25	26.25
CO	0.07	0.00	0.00	0.07
Single HAP	0.00	0.01	3.98	3.99
Total HAPs	0.00	0.01	5.55	5.56

* Taken from Technical Support Document to Registered Construction and Operation Status CP 141-10007-00184, issued December 7, 1998, which has been superceded by this MSOP 141-10870-00184.

Total Controlled/Limited Potential to Emit based on rated capacity assuming limited operations, after controls.

Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Dewald Manufacturing
Address City IN Zip: 1217 7th Street, Mishawaka, IN 46544
MSOP No.: 141-10870-00184
Reviewer: Michael Hirtler / EVP
Date: March 14, 2000

Potential Uncontrolled Emissions:																		
Coating Material	Type of Product Being Coated	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water *	Weight % Organics	Volume % Water *	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Ib VOC /gal solids	Transfer Efficiency	
As Supplied																		
VISSTAR ALK-300 (Alkyd Enamel)	metal	8.18	33.30%	0.00%	33.30%	0.00%	60.09%	0.2	11									
Acetone (as non-photochemically reactive thinning agent)		6.58	100.00%	100.00%	0.00%	100.00%	0.00%	0.1	11									
As Applied																		
VISSTAR & Acetone Diluent	metal	7.65	52.43%	28.68%	23.75%	33.33%	40.06%	0.3	11	2.72	1.82	5.99	143.82	26.25	21.03	7.56	60%	
Total Uncontrolled Potential to Emit:												5.99	143.82	26.25	21.03			
Total Controlled Potential to Emit:										Input Usage Limitation	Control Efficiency	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr			
										VOC	PM							
										0.00%	95.00%	5.99	143.82	26.25	1.05			

Methodology:

* Pursuant to 326 IAC 1-2-48, acetone is a nonphotochemically reactive hydrocarbon and the organic content is considered as water for compliance calculation purposes.

Coating "As Applied" computations:

Alkyd enamel diluted w/acetone at 1 part acetone to 2 parts paint.

(2 (8.18 lb/gal) + 1 (6.58 lb/gal)) / 3 = 7.65 lb/gal as a weighted density for the mixture

[(2*8.18*0.0) + (1*6.58*1.0)] / [(2*8.18) + (1*6.58)] = 28.68 weight % of water (including non-VOC organics) as a weighted average for the mixture

[(2*8.18*0.333) + (1*6.58*0.0)] / [(2*8.18) + (1*6.58)] = 23.75 weight % of volatiles as a weighted average for the mixture

(2 (0.6009) + 1 (0)) / 3 = 40.06 volume % of non-volatiles for mixture

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids * Transfer Efficiency)

Total Uncontrolled Potential Emissions = Sum of All Coatings and Solvents Applied

Controlled VOC Emission Rate = Uncontrolled Emission Rate * (1 - VOC Input Limitation)

Controlled PM Emission Rate = Uncontrolled Emission Rate * (1 - VOC Input Limitation) * (1 - PM Control Efficiency)

Appendix A: Hazardous Air Pollutant (HAP)
Emission Calculations From Surface Coating Operations

Company Name: Dewald Manufacturing
Address City IN Zip: 1217 7th Street, Mishawaka, IN 46544
MSOP No.: 141-10870-00184
Reviewer: Michael Hirtler / EVP
Date: March 14, 2000

Material (as applied)	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % styrene monomer	Weight % cobalt compound	Weight % naphthalene	Weight %	Weight %	Weight %	Weight %	HAP EMISSION RATES (TONS PER YEAR)						
											styrene monomer	cobalt compound	naphthalene				Total All HAPs
VISSTAR & Acetone Diluent	7.65	0.3	11	0.71%	0.71%	3.60%	0.00%	0.00%	0.00%	0.00%	0.79	0.79	3.98	0.00	0.00	0.00	5.55
Total Uncontrolled Potential to Emit (tons per year):											0.79	0.79	3.98	0.00	0.00	0.00	5.55
Total Limited Potential to Emit (tons per year):											0.79	0.79	3.98	0.00	0.00	0.00	5.55

METHODOLOGY

HAP emissions are computed for the coating "As Applied" as follows:
Alkyd enamel diluted w/acetone at 1 part thinner to 2 parts paint. HAPs are contained in the alkyd enamel at up to 1% (weight) for styrene; 1% (weight) for cobalt compounds; & 5% (weight) for naphthalene
$$\frac{(2 \text{ (8.18 lb/gal)} + 1 \text{ (6.58 lb/gal)})}{3} = 7.65 \text{ lb/gal as a weighted density for the mixture}$$
$$\frac{[(2 \times 8.18 \times \text{wt \% of HAP in paint}) + (1 \times 6.58 \times \text{wt \% of HAP in solvent})]}{[(2 \times 8.18) + (1 \times 6.58)]} = \text{HAP weight \% in the mixture}$$
$$\text{Uncontrolled Potential HAP Emission Rate (tons/yr)} = \text{Density (lb/gal)} \times \text{Gal of Material (gal/hr)} \times \text{Weight \% HAP} \times 8760 \text{ hrs/yr} \times \frac{1 \text{ ton}}{2000 \text{ lbs}}$$